

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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PHILLIP SOLIMAN,

Plaintiff,

-against-

NORFOLK SOUTHERN CORPORATION and
NORFOLK SOUTHERN RAILWAY COMPANY,

Defendant.

COMPLAINT

**PLAINTIFF
DEMANDS
TRIAL BY JURY**

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Plaintiff, Phillip Soliman, by and through his attorney, Gerald P. Gross, as and for
a Complaint, respectfully pleads as follows:

1. That plaintiff, Phillip Soliman, is a natural person, residing at 147 Avenue E,
Bayonne, New Jersey 07002.
2. That defendant Norfolk Southern Corporation is a corporation duly organized
and existing under the laws of the State of Delaware, with its principal place of business
located at, Three Commercial Place, Norfolk, Virginia 23510.
3. That defendant Norfolk Southern Railway Company is a corporation duly
organized and existing under the laws of the State of Delaware, with its principal place of
business located at, Three Commercial Place, Norfolk, Virginia 23510.
4. This action arises under a federal statute, Title 45, United States Code, sections
51 et seq., commonly known as the, Federal Employers' Liability Act.
5. That at all times relevant, defendants owned and operated in interstate
commerce a railroad line.
6. That at all times relevant, plaintiff was an employee of the defendant, Norfolk

Southern Corporation.

7. That at all times relevant, plaintiff was an employee of the defendant, Norfolk Southern Railway Company.

8. That defendant, Norfolk Southern Corporation owns the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

9. That defendant, Norfolk Southern Corporation operates the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

9. That defendant, Norfolk Southern Corporation manages the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

10. That defendant, Norfolk Southern Corporation controls the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

11. That defendant, Norfolk Southern Railway Company owns the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

12. That defendant, Norfolk Southern Railway Company operates the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

13. That defendant, Norfolk Southern Railway Company manages the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

14. That defendant, Norfolk Southern Railway Company controls the railroad yard at the Croxton Terminal in Jersey City, New Jersey.

15. That plaintiff was employed as a “car man”, performing train car repair and maintenance work.

16. That on March 24, 2010, plaintiff was in the course of his employment, working at the Croxton Terminal in Jersey City, New Jersey.

17. That on such date, and at such place, plaintiff was caused to be injured by a defective building door on the premises of the Croxton Terminal.

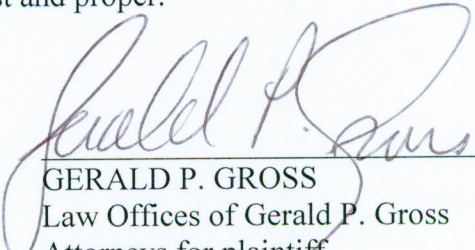
18. That defendants were negligent in their ownership, construction, operation, management, design, control, repair, maintenance, and inspection of the aforesaid building door, and all of its appurtenances, including but not limited to, the door closer, and the door knob.

19. That as a result of defendants' negligence as aforesaid, plaintiff was caused to be physically injured, lost wages and/or income, suffered mental and physical pain and suffering, incurred medical and health care expenses, will incur future lost wages and/or income, will suffer future mental and physical pain and suffering, and will incur future medical and health care expenses, together with other damages.

20. That plaintiff demands damages of \$2,000,000.00, together with the costs and disbursements of this action, and such other and further relief as may be just and proper.

WHEREFORE, plaintiff, Phillip Soliman, demands Judgment as against defendants, Norfolk Southern Corporation, and Norfolk Southern Railway Company, in the amount of \$2,000,000.00, applicable interest, costs, and disbursements, together with such other and further relief as may be just and proper.

Dated: October 8, 2010


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